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FEDERAL COMMUNICATIONS COMMISSION  
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**Report to the Federal Communications Commission on Implementation of 711 Access to TRS as Provided by CC Docket No. 92-105, In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements**

California RSA #3, Limited Partnership dba Golden State Cellular ("Golden State Cellular"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Second Report and Order* ("Second R&O") in CC Docket No. 92-105,<sup>1/</sup> hereby files a "jeopardy" report detailing why it believes it may not be able to resolve all implementation issues to provide 711 access to TRS in a timely manner, and therefore may not be compliant with Sections 64.603 and 64.604(C) paragraph (2) of the Commission's Rules on October 1, 2001.

In the *Second R&O* the Commission revised its rules so that each common carrier providing telephone voice transmission services shall provide, not later than October 1, 2001, access via the 711 dialing code to all relay services as a toll free call.<sup>2/</sup> In addition, each common carrier shall conduct not later than October 1, 2001, education and outreach programs that will increase the public awareness and understanding of 711 access to TRS.<sup>3/</sup> The Commission, however, allows wireless carriers who believe they will not be able to resolve implementation issues in a timely manner to file a Report with the Commission within four months of the effective date of the *Second R&O*, stating that their ability to comply with the one-year deadline (October 1, 2001) is in jeopardy.<sup>4/</sup> Golden State Cellular now files this instant report with the Commission.

Golden State Cellular provides analog CMRS wireless service in the California 3 - Alpine RSA.<sup>5/</sup> Golden State Cellular currently does not offer digital service in the above-referenced markets. As such, Golden State Cellular has the ability to route, and will route calls to a TRS

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<sup>1/</sup>In the Matter of The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, FCC 00-257, 15 FCC Rcd 15188, *Second Report and Order*, (rel. August 9, 2000) ("Second R&O").

<sup>2/</sup>47 C.F.R. 64.603, as amended by the *Second R&O*.

<sup>3/</sup>47 C.F.R. 64.604(C), as amended by the *Second R&O*.

<sup>4/</sup>*Second R&O* at ¶ 38.

<sup>5/</sup>Station KNKN240 (CMA338B2).

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provider via the 711 dialing code. Golden State Cellular however, intends to upgrade its network to provide digital service in the near future and is filing this jeopardy report in the event that when the rule sections become applicable to Golden State Cellular in the future when it begins to provide digital service, and Golden State Cellular's equipment vendor and/or handset providers continue to be unable to provide the requisite capability to allow TTY devices to operate over digital networks in full compliance of Sections 64.603 and 64.604(C) paragraph 2 of the Commission's rules on October 1, 2001.

As the Commission is aware, there are issues involving the ability of digital networks to provide proper access to TTY devices. In addition, compliant *subscriber* equipment is not commercially available from handset equipment vendors to permit digital carriers to offer TTY access via the 711 dialing code, or any other TTY access number, over a digital wireless network. The inability to provide TTY service to certain types of TTY devices has already come before the Commission in the context of provision of E911 access for TTY devices. In that proceeding, the Commission recognized that technical difficulties associated with achieving TTY compatibility on digital wireless systems exist and it granted an interim waiver of this compatibility requirement to over 100 carriers, while the industry worked on a solution.<sup>6/</sup>

Finally, although Golden State Cellular agrees with the spirit of Section 64.604(C) paragraph (2), it must report that compliance with the aforementioned section would be impracticable if not impossible in the context of digital subscribers until such time as the requisite subscriber interface equipment is commercially available and full network capability has been confirmed. Accordingly, it may well be premature for Golden State Cellular to: "conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible"<sup>7/</sup> for digital subscribers when that educational program must be linked to the availability of digital-capable subscribers TTY devices to enable full 711 access to TRS.

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<sup>6/</sup>See Revision of the Commission Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, 14 FCC Rcd 1700, (1998); *See also* 47 C.F.R. § 20.18 (the rule for which over 100 carriers were granted waivers).

<sup>7/</sup>See 47 C.F.R. 64.604(C) paragraph (2) as adopted in the *Second R&O*.

As soon as the issues surrounding TTY access over digital networks are resolved, Golden State Cellular intends to comply with Sections 64.603 and 64.604(C) paragraph (2) of the Commission's rules. However, as of this point in time, Golden State Cellular believes, in good faith, that full compliance by October 1, 2001 is in jeopardy with respect to future digital subscribers.

Respectfully submitted,

California RSA #3, Limited Partnership dba  
Golden State Cellular



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December 11, 2000

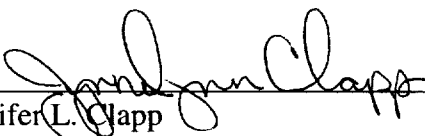
CERTIFICATE OF SERVICE

I, Jennifer L. Clapp, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 11<sup>th</sup> day of December 2000, filed the foregoing "REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON IMPLEMENTATION OF 711 ACCESS TO TRS AS PROVIDED BY CC DOCKET NO. 92-105, IN THE MATTER OF THE USE OF N11 CODES AND OTHER ABBREVIATED DIALING ARRANGEMENTS" electronically with the Federal Communications Commission. In addition, on this date, I have sent copies of this Report via hand delivery to the following:

Magalie Roman Salas, Secretary  
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Federal Communications Commission  
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Jennifer L. Clapp